

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ACCESS BUSINESS GROUP INTERNATIONAL
LLC and cargo insurers,

RULE 7.1 STATEMENT

Plaintiffs,

07 CIV 6481

- against -

BURLINGTON NORTHERN SANTA FE RAILWAY
COMPANY; BURLINGTON NORTHERN SANTA
FE CORP.; BNSF RAILWAY COMPANY; NIPPON
YUSEN KABUSHIKI KAISHA; NIPPON YUSEN
KAISHA; NYK LINE; NYK LINE (NORTH
AMERICA) INC.,

Defendants.

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RULE 7.1 STATEMENT

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure and to enable Judges and Magistrate Judges of the court to evaluate possible disqualification or recusal, the undersigned counsel for defendants NIPPON YUSEN KABUSHIKI KAISHA; NIPPON YUSEN KAISHA; NYK LINE; NYK LINE (NORTH AMERICA) INC., private non-governmental parties, certifies that the following are corporate parents, subsidiaries, or affiliates of said parties which are publicly held:

Nippon Yusen Kaisha, Ltd.

Dated: New York, New York
September 24, 2007

Respectfully submitted,

LANDMAN CORSI BALLAINE & FORD P.C.

By: 

Ronald E. Joseph (RJ9302)
Attorneys for Defendants
120 Broadway, 27th Floor
New York, New York 10271-0079
(212) 238-4800

TO: DAVID L. MAZAROLI
Attorneys for Plaintiffs
11 Park Place, Suite 1214
New York, New York 10007
(212) 267-8480

AFFIDAVIT OF SERVICE BY MAIL

STATE OF NEW YORK)
)
) ss.:
COUNTY OF NEW YORK)

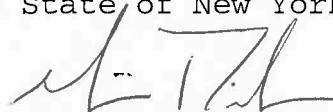
MIRIAM DEIKUN, being duly sworn, deposes and says, that deponent is not a party to the action, is over 18 years of age and resides at QUEENS, NEW YORK.

That on the 25th day of September, 2007, deponent served the within **RULE 7.1 STATEMENT**

upon

David L. Mazaroli
11 Park Place, Suite 1214
New York, New York 10007

attorneys in this action, at the addresses designated by said attorneys for that purpose by depositing a true copy of same enclosed in a postpaid properly addressed wrapper, in an official depository under the exclusive care and custody of the United States post office department within the State of New York.



Miriam Deikun

Sworn to before me this
25th day of September 2007



Notary

JELENA BRIGIDA
Notary Public, State of New York
No. 01BR6156932
Qualified in Kings County
Commission Expires Dec. 4, 2010